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13 **UNITED STATES DISTRICT COURT**

14 **EASTERN DISTRICT OF CALIFORNIA**

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16 STEPHEN PRINCE, an individual, on  
behalf of himself, and on behalf of the  
17 State of California as a private attorney  
general, all others similarly situated, and  
18 the general public,

19 Plaintiff,

20 v.

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22 CHEEMA FREIGHTLINES LLC, a  
California limited liability company, and  
23 DOES 1 through 10, inclusive,

24 Defendants.

Case No. 2:23-cv-02907-DJC-AC

**STIPULATION TO REMAND REMOVED  
ACTION TO STATE COURT; ORDER**

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**STIPULATION TO REMAND**

1 Plaintiff Stephen Prince ("Plaintiff") and Defendant Cheema Freightlines LLC  
2 ("Defendant") (together, the "Parties") hereby stipulate and agree as follows:

3 WHEREAS, on November 6, 2023, Plaintiff commenced this action on behalf of  
4 himself and similarly situated putative class of employees as a putative class action, as  
5 well as aggrieved employees under the California Private Attorneys General Act of 2004,  
6 Cal. Lab Code § 2698 *et seq.* in the Superior Court for the State of California for the County  
7 of San Joaquin, entitled *Prince v. Cheema Freightlines LLC*, bearing Case No. STK-CV-  
8 UOE-2023-11625;

9 WHEREAS, on December 13, 2023, Defendant removed this action to this Court;

10 WHEREAS, Plaintiff disputes whether Defendant's removal of this action under  
11 federal question jurisdiction was proper and whether the Court has subject matter  
12 jurisdiction over this action;

13 WHEREAS, the Parties believe that it would be proper for the action to be remanded  
14 to the Superior Court for the State of California for the County of San Joaquin for further  
15 proceedings. See 28 U.S.C. § 1447(c) ("If at any time before final judgment it appears that  
16 the district court lacks subject matter jurisdiction, the case shall be remanded.").

17 THEREFORE, IT IS STIPULATED AND AGREED that this action be remanded to  
18 the Superior Court of the State of California for the County of San Joaquin, where the action  
19 was first filed.

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1 Dated: March 25, 2025

**COUNSELONE, P.C.**

2 By: /s/ Anthony J. Orshansky

3 Anthony J. Orshansky

4 P. Bartholomew Quintans

5 Attorneys for Plaintiff

6  
7 Dated: March 25, 2025

**HBG LAW, P.C.**

8 By: /s/ Harry B. Gill [authorized on 3/25/25]

9 Harry B. Gill

10 Attorneys for Defendant

**ORDER**

The Court approves the Parties' Stipulation to Remand Removed Action to State Court, and therefore REMANDS this action to the Superior Court of the State of California for the County of San Joaquin. The Clerk of Court shall close this case and serve a copy of this order on the Superior Court of the State of California for the County of San Joaquin.

**IT IS SO ORDERED.**

Dated: March 25, 2025

/s/ Daniel J. Calabretta

THE HONORABLE DANIEL J. CALABRETTA  
UNITED STATES DISTRICT JUDGE